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Attorney for CHARLES LOBELLO

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,) Case No. 2:10-cr-324-JCM-NJK

Plaintiff,

vs.

CHARLES LOBELLO,

Defendant.

UNOPPOSED MOTION TO EXTEND

SURRENDER DATE

Defendant CHARLES LOBELLO ("Charles"), through his attorney, John R. Lusk, Esq., respectfully moves this Court for an Order extending by two-weeks (14 days) the current date of April 15, 2013, for Charles to self-surrender to the facility designated by the Bureau of Prisons for service of his sentence. This motion is made because Charles did not receive the notice from the Marshall's Service as to the facility designated by the BOP until the afternoon of April 10, 2013. This allows only four and one-half days for Charles to make transportation and hotel reservations to arrive at the designated facility by April 15th.

On such short notice, the air fare alone will double in costs. Also, Charles has many third parties to notify as to where he can be contacted in the future and how to care for his 90-year old father who has been hospitalized twice within the past week. At least two weeks (14 days) is requested in order to make the necessary travel arrangements and to give notice and directions to third parties.

Undersigned counsel represents that he spoke with the Marshall's Service on April 9, 2013, and was advised that the notice to Charles was being sent out that day. As stated above, Charles received it

1 on the afternoon of April 10th. Undersigned counsel also has spoken with Government counsel
2 Thomas Flynn, Esq. about these circumstances and he advised that the Government does not oppose a
3 continuance of two-weeks (14 days) for Charles' surrender date..

4 DATED: 11 April 2013

5 Respectfully submitted,

6 /John R. Lusk/

7 JOHN R. LUSK, ESQ

8 Attorney for CHARLES LOBELLO

9 **CERTIFICATE OF SERVICE VIA EMAIL**

10
11 I certify that on the 11th day of April, 2013, I served a copy of the foregoing **UNOPPOSED**
12 **MOTION TO EXTEND SURRENDER DATE** on the following person by EMAILING said copy to
13 their last known EMAIL address:

14 THOMAS FLYNN, Tax Division, Dept. of Justice, Washington, D.C.
15 Email: thomas.w.flynn@usdoj.gov and Thomas.w.flynn@tax.usdoj.gov

16
17 /John R. Lusk/

18 John R. Lusk

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 **-oOo-**

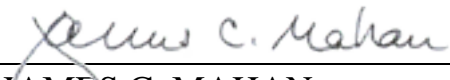
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5 UNITED STATES OF AMERICA,) 2:10-cr-324-JCM-NJK
6 Plaintiff,)
7 vs.)
8 CHARLES LOBELLO,)
9 Defendant.)
10 _____)

11
12 **ORDER EXTENDING SURRENDER DATE**

13 The Court having considered the motion filed by Defendant CHARLES LOBELLO and the
14 Government having no objection thereto, and good cause appearing,

15 **IT IS HEREBY ORDERED** that the date for Defendant CHARLES LOBELLO
16 to self-surrender at the designated Bureau of Prisons facility is extended from April 15,
17 2013, to April 29, 2013.

18 DATED April 12, 2013.

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20 
21 JAMES C. MAHAN
22 United States District Judge
23 District of Nevada
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